



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

George Allen
Governor

5636 Southern Boulevard
Virginia Beach, Virginia 23462
Fax (757) 518-2103
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Thomas L. Hopkins
Director

Becky Norton Dunlop
Secretary of Natural Resources

Francis L. Daniel
Tidewater Regional Director
(757) 518-2000

January 13, 1997

Mr. Chris Peterson
Owner
Crossroad Cleaners and Laundry
4304 E. Indian River Road
Chesapeake, Virginia 23325

**RE: RCRA Compliance Inspection, Crossroad Cleaners and Laundry,
4304 E. Indian River Rd., Chesapeake, EPA ID# VAD010053692**

Dear Mr. Peterson:

This office received your letter dated January 2, 1997, addressing violations noted during my November 19, 1996, Hazardous Waste Compliance Inspection. The corrective actions indicated in your letter are acceptable in bringing the above referenced facility back into compliance with the Virginia Hazardous Waste Management Regulations (VHWMR).

If you have any questions regarding this matter, please call me at (757) 518-2182.

Sincerely,

A handwritten signature in cursive script, reading "Jeffrey K. Deibler".

Jeffrey K. Deibler
Environmental Inspector Senior

c: Claire Ballard, DEQ, OTA



NOV 26 1996

COMMONWEALTH of VIRGINIA

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November 22, 1996

Mr. Chris Peterson
Owner
Crossroad Cleaners and Laundry
4304 E. Indian River Road
Chesapeake, Virginia 23325

NOTICE OF VIOLATION

RE: RCRA Compliance Inspection, Crossroad Cleaners and Laundry (previously Pamper Cleaners), 4304 E. Indian River Rd., Chesapeake, EPA ID# VAD010053692

Dear Mr. Peterson:

During a recent Hazardous Waste Compliance Inspection on November 19, 1996, it was noted that your facility is classified as a **SMALL QUANTITY GENERATOR**. During the inspection it was also noted that your facility was not in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated on the enclosed inspection checklists and are listed below. The below listed violation was also found during my previous inspection on February 13, 1996.

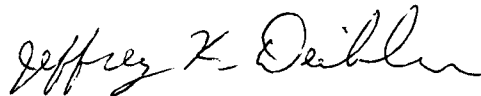
1. Your 180 day accumulation area is not inspected at least weekly as required by §9.8.E. of the VHWMR.

Please take the appropriate corrective actions to bring your facility into compliance with the above within **30 days** of receipt of this letter and send a letter to this office at that time stating the corrective actions taken. Enclose any supporting documentation to the corrective actions taken.

Mr. Chris Peterson
November 22, 1996
Page 2 of 2

PLEASE CALL ME UPON RECEIPT OF THIS LETTER and if you have any questions regarding this matter. My telephone number is (757) 518-2182.

Sincerely,

A handwritten signature in cursive script, reading "Jeffrey K. Deibler".

Jeffrey K. Deibler
Environmental Inspector Senior

Enclosures

c: Claire Ballard, DEQ, OTA

DEPARTMENT OF ENVIRONMENTAL QUALITY

SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: CROSSROAD CLEANERS AND LAUNDRY
(PREVIOUSLY: PAMPER CLEANERS/ATA INC.)

ADDRESS: 4304 E. INDIAN RIVER ROAD
CHESAPEAKE, VIRGINIA 23325

EPA ID NUMBER: VAD010053692

FACILITY
REPRESENTATIVE: CHRIS PETERSON

TITLE: OWNER

TELEPHONE NUMBER: (804) 420-7493

INSPECTOR'S NAME: JEFFREY K. DEIBLER

TITLE: ENVIRONMENTAL INSPECTOR SENIOR

DATE of INSPECTION: NOVEMBER 19, 1996

-
1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

DRY CLEANING AND LAUNDRY

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

WASTE TETRACHLOROETHYLENE, LIQUID, F002, D007, D008, D039, D040
WASTE TETRACHLOROETHYLENE, FILTERS, F002, D039

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
LIQUID	390 POUNDS	390 POUNDS
FILTERS	480 POUNDS	480 POUNDS

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?
- NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste?

NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

TRANS.- SAFETY-KLEEN CORP., ILD984908202
FACILITY- SAFETY-KLEEN CORP., LEXINGTON, SC, SCD077995488

6. Does the facility generate any hazardous waste that is excluded from regulation? If yes, list the waste and the basis for exclusion.
- NO

7. Does the facility:

Generate	Market	Burn
----------	--------	------

used oil that is burned for energy recovery? **Underline or circle all that are applicable.** (If the facility markets or burns used oil, fill out the Used Oil Checklist.)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste? If **YES**, then fill out the **Used Oil Checklist**.

NO

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If Yes, list the waste, where it is sent, and complete the **Metals Recovery Checklist**.

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? If yes, Underline or circle all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**.

NO

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. **SMALL QUANTITY GENERATOR**
- c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain _____

[Underline or Circle All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	Number of Containers	Number of Tanks	Capacity
180 DAY	4 EMPTY	0	25 GAL EA
SATELLITE	1	0	15 GAL

13. Comments:

14. Waste Management Flow Diagram:

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

WASTE TETRACHLOROETHYLENE, LIQUID
F002, D007, D008, D039, D040

WASTE TETRACHLOROETHYLENE, FILTERS
F002, D039

SAFETY-KLEEN CORP.
LEXINGTON, SC



Revised January 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF SMALL QUANTITY GENERATORS (SQG)

FACILITY NAME: CROSSROAD CLEANERS AND LAUNDRY

EPA ID NUMBER: VAD010053692

INSPECTION DATE: NOVEMBER 19, 1996

NOTE: * means Non-Compliance

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.4.a.	1. Does the generator ever accumulate a quantity of hazardous waste greater than 6,000 kilograms? (If <u>YES</u> , then use <u>LQG</u> or <u>UNAUTHORIZED FACILITY Checklist</u> .)		X	
6.4.E.4. 6.4.E.5. 6.4.E.6. 6.4.E.4.c. 9.9.L.	2. Does the small quantity generator accumulate hazardous waste for greater than 180 days (or 270 days if the disposal facility is greater than 200 miles away)? (If <u>YES</u> , then use <u>UNAUTHORIZED FACILITY Checklist</u> .) (If the SQG accumulates in <u>TANKS</u> , complete the SQG Tank Section, Items 23 through 25.)		X	
6.4.E.4.d. 9.2.B.1.	3. Does the generator have an internal communication or alarm system capable of providing immediate emergency instruction to facility personnel? VOICE	X		
6.4.E.4.d. 9.2.B.2.	4. Does the generator have a device such as a telephone or two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or Commonwealth or local emergency response teams? ***DESCRIBE ON THE LAST PAGE UNDER "COMMENTS". TELEPHONE	X		
6.4.E.4.d. 9.2.B.3.	5. Does the facility have portable fire extinguishers, fire control equipment, and decontamination equipment?	X		
6.4.E.4.d. 9.2.B.4.	6. Is there water at adequate volume and pressure to supply expected fire demands?	X		
6.4.E.4.d. 9.2.C.	7. Does the facility test and maintain the equipment in the previous four questions as necessary to assure proper operation? FIRE EXTINGUISHERS TESTED EVERY 6 MONTHS	X		

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.4.d. 9.2.C.	8. Is a log maintained of these inspections? TAGS ON FIRE EXTINGUISHERS	X		
6.4.E.4.d. 9.2.E.	9. Is there adequate aisle space to allow the unobstructed movement of personnel, fire protection, spill control, and decontamination equipment to any area of the facility?	X		
6.4.E.4.d. 9.2.F.	10. Has the facility attempted to arrange agreements with the local authorities such that: AUTHORITIES DECLINED SITE VISIT, TOLD TO DIAL 911			
6.4.E.4.d. 9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes?	X		
6.4.E.4.d. 9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, the agreements specify a primary emergency authority?	X		
6.4.E.4.d. 9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and	X		
6.4.E.4.d. 9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?	X		
6.4.E.4.e.(1)	11. Is there at least one employee either on the premises or on call at all times with the responsibility for coordinating all emergency response measures? (Emergency coordinator) NAME: CHRIS PETERSON TITLE: OWNER	X		
6.4.E.4.e.(2)	12. Is the following posted next to the facility telephone:			
6.4.E.4.e. (2)(a)	A. The name and telephone number of the emergency coordinator?	X		
6.4.E.4.e. (2)(b)	B. The location of fire extinguishers and spill control material; and if present, the location of the fire alarm? and	X		
6.4.E.4.e. (2)(c)	C. The telephone number of the fire department (if no direct fire alarm)?	X		
5.B. 5.C.	13. Does the small quantity generator use a manifest to ship wastes off-site? If NO , go to Item # 18. If YES , continue.	X		
6.2.C.	14. Has the generator determined that the facility has an EPA ID number? (NOTE: Shipments to POTWs must be manifested, if transported by a vehicle and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.)	X		

PART/ SECTION	REGULATION	YES	NO	N/A
5.5.A.7.	15. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?	X		
6.3. 5.3.B.1.	16. Is the following information on the manifest:			
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.	B. A unique five digit number assigned to this manifest by the generator?	X		
5.3.B.3.	C. The total number of pages of the manifest?	X		
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	X		
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number(UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.	G. The quantities of waste being shipped? and	X		
5.3.C.	H. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."	X		
6.5.C.2.	17. Exception reporting: If the generator (SQG) has not received a copy of a manifest signed by facility within 60 days of initial transporter, did he submit a legible copy of manifest with an indication of not receiving a confirmation of delivery, to the Director?			X
5.C.	18. Does the small quantity generator have his wastes reclaimed under a contract, and use only a shipping paper? If YES,		X	
5.C.1.a.	A. Are the type of waste and frequency of reclamation shipments specified in the agreement?			X

PART/ SECTION	REGULATION	YES	NO	N/A
5.C.1.b.	B. Is the vehicle used to transport the waste to the recycling facility and to deliver material back to the generator owned and operated by the reclaimer? and			X
5.C.2.	C. Does the small quantity generator maintain a copy of the agreement in his files for at least three years after termination or expiration of the agreement?			X
6.5.A.1.3. 15.1.G.1.a.	19. Does the generator retain copies of all manifests, test results and waste analyses for at least three years? Land Disposal Restriction Form should be retained for at least five years.	X		
6.4.E.4.e.(3)	20. Does the generator ensure all employees are thoroughly familiar with proper waste handling and emergency procedures? MR. PETERSON IS ONLY PERSON WHO HANDLES HAZARDOUS WASTE AT THIS FACILITY	X		
6.5.D.	21. Has the generator ever submitted a release report if responsible for release of Hazardous Substance which threatens public health? (Must notify NRC, Local Government, the Department.)			X
6.4.E.4.b. 9.8.	22. Use and Management of Containers for 180 day accumulation areas: (270 days if TSF is over 200 miles away.)			
9.8.B.	A. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?	X		
9.8.C.	B. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	X		
6.4.E.4.d. 6.4.E.1.b.	C. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? ALL CONTAINERS ARE EMPTY	X		
6.4.E.4.d. 6.4.E.1.c.	D. Is the container labeled or marked clearly with the words "Hazardous Waste"?	X		
9.8.D.1.	E. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste?	X		
9.8.E.	F. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?		*	
9.8.G.1.	G. Are incompatible wastes placed in separate containers? and			X

PART/ SECTION	REGULATION	YES	NO	N/A
9.8.G.3.	H. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	X		
6.4.E.3.a.	I. Does the generator have satellite accumulation areas where up to 55 gal of any one type of Hazardous Waste (HW) (1 qt acutely HW) are accumulated? If yes,	X		
6.4.E.3.a.	1. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	X		
6.4.E.3.a.(1) 9.8.B.	2. Are the containers in good condition?	X		
6.4.E.3.a.(1) 9.8.C.	3. Are the containers compatible with the waste?	X		
6.4.E.3.a.(1) 9.8.D.1.	4. Are the containers kept closed except as necessary to add or remove waste? and	X		
6.4.E.3.a.(2)	5. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	X		
6.4.E.3.b.	J. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,		X	
	1. Has the generator marked the excess amount with the date the excess amount began accumulating? and			X
	2. Has the generator either removed the excess amount within three days of the date of excess accumulation or has he complied with all other provisions for accumulation areas. Namely, has he notified the Executive Director about the location of the accumulation area?			X
9.9.L.	23. Does the small quantity generator accumulate in tanks? If YES, describe Tank System in the COMMENT Section.		X	
9.9.L.2.c.	A. If the TANK is uncovered, is there at least 2 feet of freeboard or a system with the capacity to hold the volume equivalent to 2 feet of freeboard? Describe the System in the COMMENT Section.			X
9.9.L.2.d.	B. If the TANK is fed continuously, is there a waste feed cutoff system or by-pass system? Describe the System in the COMMENT Section.			X
9.9.L.3.	C. Does the Small Quantity Generator (SQG) inspect the following at least once each operating day:			

PART/ SECTION	REGULATION	YES	NO	N/A
9.9.L.3.a.	1. Discharge control equipment?			X
9.9.L.3.b.	2. Data gathered from monitoring equipment?			X
9.9.L.3.c.	3. The level of waste in the Tanks?			X
9.9.L.3.d.	D. Does the SQG inspect the following at least weekly:			
9.9.L.3.d	1. The construction materials of the Tanks for corrosion or leaking?			X
9.9.L.3.e.	2. The area immediately surrounding the discharge confinement system for leaks?			X
9.9.L.5.	E. If ignitable or reactive waste are generated, is the waste:			X
9.9.L.5.a.(1)	1. treated, rendered, or mixed before or immediately after placement so that the waste is no longer ignitable or reactive; or			X
9.9.L.5.a.(2)	2. protected from any material or conditions that may cause the waste to ignite or react; or			X
9.9.L.5.a.(3)	3. is the Tank used only for emergencies?			X
9.9.L.5.b.	F. If the Tank is covered and manages ignitable or reactive waste, are the buffer zones for the National Fire Protection Association codes met? List the required and actual distances: Required _____ Actual _____ _____			X
9.9.L.6	G. Are incompatible waste placed in the same tank? If YES,			X
	Is the tank cleaned prior to placing the incompatible waste in the Tank?			X
6.4.E.4.d	24. Is the Tank clearly marked with the words "Hazardous Waste"?			X
	25. LEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035) ON THE LAST PAGE UNDER "COMMENTS".			
15.1.A.2.	26. Does the facility GENERATE , transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		
15.1.G.1.a.	27. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X		
	28. Did the notification include the following information:			

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.a. (1)	A. EPA Hazardous Waste Number?	X		
15.1.G.1.a. (2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.c.?	X		
15.1.G.1.a. (3)	C. The manifest number associated with the shipment of waste? and	X		
15.1.G.1.a. (4)	D. Waste analysis data, where available?			X
15.1.A.3.	29. Is land disposal of wastes occurring? If Yes,		X	
15.1.A.3.a.	A. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? OR			X
15.1.A.3.b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X
15.1.A.3.c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.A.5.a.	30. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste per month? If so, the wastes are not subject to any provision of Part XV.		X	
15.1.E.	31. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?			X
6.4.E.7., 6.4.E.4.d., 15.1.G.1.d.	32. Is the SQG treating waste in Tanks or Containers in order to meet applicable treatment standards under VHWMR § 15.4?		X	
15.1.G.1.d.	33. If Yes, has the SQG developed a Waste Analysis Plan?			X
15.1.G.1.d. (2)	34. Has the Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity?			X
15.1.F.	35. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?			X
15.1.C.1.	36. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.D.1.	37. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	38. If Yes, does the facility meet the following requirements:			
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?			X
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of § 15.1.D.1.C. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted waste. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X
15.1.G.1.b.	39. For restricted wastes which the generator has determined can be land disposed without further treatment, has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?			X
	40. Did the notification include the following information:			
15.1.G.1.b. (1)(a)	A. EPA Hazardous Waste Number?			X
15.1.G.1.b. (1)(b)	B. The corresponding treatment standards and all applicable prohibitions?			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.b. (1)(c)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1.b. (1)(d)	D. Waste analysis date, where available?			X
15.1.G.1.b.2.	41. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1.c.	42. Have restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?			X
15.1.G.1.g.	43. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X		
15.5.	44. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	45. If Yes, is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

COMMENTS:



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

PETER W. SCHMIDT
DIRECTOR

FRANCIS L. DANIEL
REGIONAL DIRECTOR

TIDEWATER REGIONAL OFFICE
291 INDEPENDENCE BOULEVARD
PEMBROKE FOUR, SUITE 219
VIRGINIA BEACH, VIRGINIA 23462
(804) 552-1251

FAX (804) 552-1253 TDD # - RICHMOND (804) 762-4021

February 16, 1996

Mr. Chris Peterson
Owner
Crossroad Cleaners and Laundry
4304 E. Indian River Road
Chesapeake, Virginia 23325

LETTER OF WARNING

RE: RCRA Compliance Inspection, Crossroad Cleaners and Laundry (previously Pamper Cleaners), 4304 E. Indian River Rd., Chesapeake, EPA ID# VAD010053692

Dear Mr. Peterson:

During a recent Hazardous Waste Compliance Inspection on February 13, 1996, it was noted that your facility is classified as a SMALL QUANTITY GENERATOR. During the inspection it was also noted that your facility was not in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated on the enclosed inspection checklists and are listed below:

1. Your facility has not attempted to arrange agreements with the local police department, fire department and emergency response teams, and the local hospital, such that they are familiar with the layout of your site and the properties of hazardous wastes handled at your facility as required by §6.4.E.4.d. of the VHWMR.
2. The name and telephone number of the emergency coordinator, the location of fire extinguishers and spill control material, and the telephone number of the fire department are not posted next to the facility telephone as required by §6.4.E.4.e.(2) of the VHWMR.

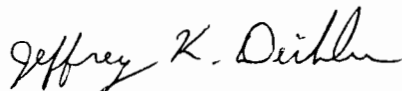
Mr. Chris Peterson
February 16, 1996
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3. You have not ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures at your facility as required by §6.4.E.4.e.(3) of the VHWMR.
4. The date which each period of accumulation began is not marked on each container holding hazardous waste in your 180 day accumulation area as required by §6.4.E.4.d. of the VHWMR. **THE DATES WERE MARKED ON EACH CONTAINER AT THE TIME OF THE INSPECTION.**
5. Your 180 day accumulation area is not inspected at least weekly as required by §9.8.E. of the VHWMR.

Please take the appropriate corrective actions to bring your facility into compliance with numbers 1, 2, 3, and 5 above within **30 days** of receipt of this letter and send a letter to this office at that time stating the corrective actions taken. Enclose any supporting documentation to the corrective actions taken.

PLEASE CALL ME UPON RECEIPT OF THIS LETTER and if you have any questions regarding this matter. My telephone number is (804) 552-1251.

Sincerely,



Jeffrey K. Deibler
Environmental Inspector Senior

JD:llk

Enclosures

c: Claire Slaughter, DEQ, OTA

DEPARTMENT OF ENVIRONMENTAL QUALITY

SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY: CROSSROAD CLEANERS AND LAUNDRY
(PREVIOUSLY: PAMPER CLEANERS/ATA INC.)

ADDRESS: 4304 E. INDIAN RIVER ROAD
CHESAPEAKE, VIRGINIA 23325

EPA ID NUMBER: VAD010053692

FACILITY
REPRESENTATIVE: CHRIS PETERSON

TITLE: OWNER

TELEPHONE NUMBER: (804) 420-7493

INSPECTOR'S NAME: JEFFREY K. DEIBLER

TITLE: ENVIRONMENTAL INSPECTOR SENIOR

DATE of INSPECTION: FEBRUARY 13, 1996

-
1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.)

DRY CLEANING AND LAUNDRY

2. Give a brief description of the waste stream(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm.

WASTE TETRACHLOROETHYLENE, LIQUID, F002, D007, D008, D039, D040
WASTE TETRACHLOROETHYLENE, FILTERS, F002, D039

3. List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.

Waste Code	Amount Generated	Amount Accumulated
LIQUID	390 POUNDS	390 POUNDS
FILTERS	480 POUNDS	480 POUNDS

4. Does the facility ever generate greater than:
1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?
- NO

100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste?

NO

If yes, then the facility is a large quantity generator.

5. How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed).

TRANS.- SAFETY-KLEEN CORP., ILD984908202
FACILITY- SAFETY-KLEEN CORP., LEXINGTON, SC, SCD077995488

6. Does the facility generate any hazardous waste that is excluded from regulation? If **yes**, list the waste and the basis for exclusion.
- NO

7. Does the facility:

Generate	Market	Burn
----------	--------	------

used oil that is burned for energy recovery? **Underline or circle all that are applicable.** (If the facility markets or burns used oil, fill out the Used Oil Checklist.)

NO

Does the generator of used oil to be burned for energy recovery (other than a **Conditionally Exempt Small Quantity Generator**) mix the used oil with hazardous waste? If **YES**, then fill out the **Used Oil Checklist**.

NO

8. Does the facility generate any hazardous waste that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these?

NO

If Yes, list the waste, where it is sent, and complete the **Metals Recovery Checklist**.

9. Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? If yes, Underline or circle all that are applicable. If the facility stores batteries before reclaiming them, complete the **Metals Recovery Checklist**.

NO

10. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. **SMALL QUANTITY GENERATOR**
- c. generator
- d. permitted or interim status TSD
- e. unpermitted TSD (explain in comments section)
- f. transporter
- g. other: please explain _____

[Underline or Circle All That Are Applicable]

11. Check accumulation times and quantities for the three types of generators. If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).

A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.

Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks only). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.

12. List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]

Location	Number of Containers	Number of Tanks	Capacity
180 DAY	2	0	15 GAL EA
	1		25 GAL
	1 EMPTY		25 GAL
SATELLITE	1	0	15 GAL

13. Comments:

14. Waste Management Flow Diagram:

(Sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

WASTE TETRACHLOROETHYLENE, LIQUID F002, D007, D008, D039, D040		SAFETY-KLEEN CORP. LEXINGTON, SC
WASTE TETRACHLOROETHYLENE, FILTERS F002, D039		

DEPARTMENT OF ENVIRONMENTAL QUALITY

CHECKLIST FOR HAZARDOUS WASTE INSPECTION OF SMALL QUANTITY GENERATORS (SQG)

FACILITY NAME: CROSSROAD CLEANERS AND LAUNDRY

EPA ID NUMBER: VAD010053692

INSPECTION DATE: FEBRUARY 13, 1996

NOTE: * means Non-Compliance

VIRGINIA HAZARDOUS WASTE MANAGEMENT REGULATIONS

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.4.a.	1. Does the generator ever accumulate a quantity of hazardous waste greater than 6,000 kilograms? (If YES , then use LQG or UNAUTHORIZED FACILITY Checklist.)		X	
6.4.E.4. 6.4.E.5. 6.4.E.6. 6.4.E.4.c. 9.9.L.	2. Does the small quantity generator accumulate hazardous waste for greater than 180 days (or 270 days if the disposal facility is greater than 200 miles away)? (If YES , then use UNAUTHORIZED FACILITY Checklist.) (If the SQG accumulates in TANKS , complete the SQG Tank Section, Items 23 through 25.)		X	
6.4.E.4.d. 9.2.B.1.	3. Does the generator have an internal communication or alarm system capable of providing immediate emergency instruction to facility personnel? VOICE	X		
6.4.E.4.d. 9.2.B.2.	4. Does the generator have a device such as a telephone or two-way radio, capable of summoning emergency assistance from local police departments, fire departments, or Commonwealth or local emergency response teams? ***DESCRIBE ON THE LAST PAGE UNDER "COMMENTS". TELEPHONE	X		

PART/ SECTION	REGULATION	YES	NO	N/A
6.4.E.4.d. 9.2.B.3.	5. Does the facility have portable fire extinguishers, fire control equipment, and decontamination equipment?	X		
6.4.E.4.d. 9.2.B.4.	6. Is there water at adequate volume and pressure to supply expected fire demands?	X		
6.4.E.4.d. 9.2.C.	7. Does the facility test and maintain the equipment in the previous four questions as necessary to assure proper operation? FIRE EXTINGUISHERS TESTED EVERY 6 MONTHS	X		
6.4.E.4.d. 9.2.C.	8. Is a log maintained of these inspections? TAGS ON FIRE EXTINGUISHERS	X		
6.4.E.4.d. 9.2.E.	9. Is there adequate aisle space to allow the unobstructed movement of personnel, fire protection, spill control, and decontamination equipment to any area of the facility?	X		
6.4.E.4.d. 9.2.F.	10. Has the facility attempted to arrange agreements with the local authorities such that:			
6.4.E.4.d. 9.2.F.1.a.	A. The police, fire and emergency response teams are familiar with the layout of the site, the properties of the hazardous waste handled at the site, normal working areas, entrances to roads inside the facility and possible evacuation routes?		*	
6.4.E.4.d. 9.2.F.1.b.	B. Where more than one police and fire department might respond to an emergency, the agreements specify a primary emergency authority?		*	
6.4.E.4.d. 9.2.F.1.c.	C. Agreements with Commonwealth emergency response teams, emergency response contractors and equipment suppliers are specified? and		*	
6.4.E.4.d. 9.2.F.1.d.	D. The local hospital is familiar with the properties of the hazardous wastes handled and the types of injuries or illnesses which could result from fires, explosions, or releases?		*	
6.4.E.4.e.(1)	11. Is there at least one employee either on the premises or on call at all times with the responsibility for coordinating all emergency response measures? (Emergency coordinator) NAME: CHRIS PETERSON TITLE: OWNER	X		
6.4.E.4.e.(2)	12. Is the following posted next to the facility telephone:			
6.4.E.4.e. (2)(a)	A. The name and telephone number of the emergency coordinator?		*	
6.4.E.4.e. (2)(b)	B. The location of fire extinguishers and spill control material; and if present, the location of the fire alarm? and		*	
6.4.E.4.e. (2)(c)	C. The telephone number of the fire department (if no direct fire alarm)?		*	

PART/ SECTION	REGULATION	YES	NO	N/A
5.B. 5.C.	13. Does the small quantity generator use a manifest to ship wastes off-site? If NO , go to Item # 18. If YES , continue.	X		
6.2.C.	14. Has the generator determined that the facility has an EPA ID number? (NOTE: Shipments to POTWs must be manifested, if transported by a vehicle and the POTW must meet all permit-by-rule requirements of VHWMR Section 11.8.B.)	X		
5.5.A.7.	15. Has the generator determined that the transporter has a valid EPA Identification number and a valid Virginia Transporter Permit?	X		
6.3. 5.3.B.1.	16. Is the following information on the manifest:			
5.3.B.1.	A. The generator's name, mailing address, EPA ID number, and telephone number?	X		
5.3.B.2.	B. A unique five digit number assigned to this manifest by the generator?	X		
5.3.B.3.	C. The total number of pages of the manifest?	X		
5.3.B.4.	D. The company name and EPA ID number of each transporter used?	X		
5.3.B.5.	E. The company name, site address, and EPA ID number of the facility designated to receive the waste?	X		
5.3.B.6.	F. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID number(UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material?	X		
5.3.B.7.	G. The quantities of waste being shipped? and	X		
5.3.C.	<p>H. The following certification:</p> <p>"I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."</p>	X		

PART/ SECTION	REGULATION	YES	NO	N/A
6.5.C.2.	17. Exception reporting: If the generator (SOG) has not received a copy of a manifest signed by facility within 60 days of initial transporter, did he submit a legible copy of manifest with an indication of not receiving a confirmation of delivery, to the Director?			X
5.C.	18. Does the small quantity generator have his wastes reclaimed under a contract, and use only a shipping paper? If YES,		X	
5.C.1.a.	A. Are the type of waste and frequency of reclamation shipments specified in the agreement?			X
5.C.1.b.	B. Is the vehicle used to transport the waste to the recycling facility and to deliver material back to the generator owned and operated by the reclaimer? and			X
5.C.2.	C. Does the small quantity generator maintain a copy of the agreement in his files for at least three years after termination or expiration of the agreement?			X
6.5.A.1.3. 15.1.G.1.a.	19. Does the generator retain copies of all manifests, test results and waste analyses for at least three years? Land Disposal Restriction Form should be retained for at least five years.	X		
6.4.E.4.e.(3)	20. Does the generator ensure all employees are thoroughly familiar with proper waste handling and emergency procedures?		*	
6.5.D.	21. Has the generator ever submitted a release report if responsible for release of Hazardous Substance which threatens public health? (Must notify NRC, Local Government, the Department.)			X
6.4.E.4.b. 9.8.	22. Use and Management of Containers for 180 day accumulation areas: (270 days if TSF is over 200 miles away.)			
9.8.B.	A. Are all containers holding hazardous waste in good condition, i.e., not showing signs of leakage or corrosion or any other deterioration/deformation?	X		
9.8.C.	B. Are the containers lined or made of materials compatible with hazardous waste placed into them so that the container will not react with, or otherwise be incompatible with, the hazardous wastes stored?	X		
6.4.E.4.d. 6.4.E.1.b.	C. Is the date upon which each period of accumulation begins clearly marked and visible for inspection on each container? MARKED AT TIME OF INSPECTION		*	
6.4.E.4.d. 6.4.E.1.c.	D. Is the container labeled or marked clearly with the words "Hazardous Waste"?	X		
9.8.D.1.	E. Are all containers holding hazardous waste kept closed during storage except as necessary to add or remove waste?	X		

PART/ SECTION	REGULATION	YES	NO	N/A
9.8.E.	F. Are areas where hazardous waste containers are stored inspected by the owner/operator at least weekly?		*	
9.8.G.1.	G. Are incompatible wastes placed in separate containers? and	X		
9.8.G.3.	H. Are storage containers holding hazardous wastes which are incompatible with any materials or other hazardous wastes stored nearby separated from the other materials or protected from them by means of dikes, berms, walls, or other devices?	X		
6.4.E.3.a.	I. Does the generator have satellite accumulation areas where up to 55 gal of any one type of Hazardous Waste (HW) (1 qt acutely HW) are accumulated? If yes,	X		
6.4.E.3.a.	1. Is the area located at or near the point of hazardous waste generation where the wastes initially accumulate?	X		
6.4.E.3.a.(1) 9.8.B.	2. Are the containers in good condition?	X		
6.4.E.3.a.(1) 9.8.C.	3. Are the containers compatible with the waste?	X		
6.4.E.3.a.(1) 9.8.D.1.	4. Are the containers kept closed except as necessary to add or remove waste? and	X		
6.4.E.3.a.(2)	5. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container?	X		
6.4.E.3.b.	J. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes,		X	
	1. Has the generator marked the excess amount with the date the excess amount began accumulating? and			X
	2. Has the generator either removed the excess amount within three days of the date of excess accumulation or has he complied with all other provisions for accumulation areas. Namely, has he notified the Executive Director about the location of the accumulation area?			X
9.9.L.	23. Does the small quantity generator accumulate in tanks? If YES, describe Tank System in the COMMENT Section.		X	
9.9.L.2.c.	A. If the TANK is uncovered, is there at least 2 feet of freeboard or a system with the capacity to hold the volume equivalent to 2 feet of freeboard? Describe the System in the COMMENT Section.			X

PART/ SECTION	REGULATION	YES	NO	N/A
9.9.L.2.d.	B. If the TANK is fed continuously, is there a waste feed cutoff system or by-pass system? Describe the System in the COMMENT Section.			X
9.9.L.3.	C. Does the Small Quantity Generator (SQG) inspect the following at least once each operating day:			
9.9.L.3.a.	1. Discharge control equipment?			X
9.9.L.3.b.	2. Data gathered from monitoring equipment?			X
9.9.L.3.c.	3. The level of waste in the Tanks?			X
9.9.L.3.d.	D. Does the SQG inspect the following at least weekly:			
9.9.L.3.d	1. The construction materials of the Tanks for corrosion or leaking?			X
9.9.L.3.e.	2. The area immediately surrounding the discharge confinement system for leaks?			X
9.9.L.5.	E. If ignitable or reactive waste are generated, is the waste:			X
9.9.L.5.a.(1)	1. treated, rendered, or mixed before or immediately after placement so that the waste is no longer ignitable or reactive; or			X
9.9.L.5.a.(2)	2. protected from any material or conditions that may cause the waste to ignite or react; or			X
9.9.L.5.a.(3)	3. is the Tank used only for emergencies?			X
9.9.L.5.b.	F. If the Tank is covered and manages ignitable or reactive waste, are the buffer zones for the National Fire Protection Association codes met? List the required and actual distances: Required _____ Actual _____ _____			X
9.9.L.6	G. Are incompatible waste placed in the same tank? If YES,			X
	Is the tank cleaned prior to placing the incompatible waste in the Tank?			X
6.4.E.4.d	24. Is the Tank clearly marked with the words "Hazardous Waste"?			X
	25. LEASE LIST ANY NEWLY REGULATED WASTE THAT IS NOT LAND RESTRICTED (such as D018-D043, F032, F034 or F035) ON THE LAST PAGE UNDER "COMMENTS".			
15.1.A.2.	26. Does the facility GENERATE , transport, treat, store or dispose any land-restricted wastes? (See VHWMR Part 15) *** PLEASE LIST ON THE LAST PAGE UNDER "COMMENTS".	X		

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.G.1.a.	27. For restricted wastes which the generator is managing for which he has not met the applicable treatment standards, has the generator accompanied each shipment of waste with a notification to the treatment facility of the appropriate treatment standards and any applicable prohibitions?	X		
	28. Did the notification include the following information:			
15.1.G.1.a. (1)	A. EPA Hazardous Waste Number?	X		
15.1.G.1.a. (2)	B. The corresponding treatment standards and all applicable prohibitions set forth in VHWMR Section 15.3.c.?	X		
15.1.G.1.a. (3)	C. The manifest number associated with the shipment of waste? and	X		
15.1.G.1.a. (4)	D. Waste analysis data, where available?			X
15.1.A.3.	29. Is land disposal of wastes occurring? If Yes,		X	
15.1.A.3.a.	A. Has the facility been granted an extension to the effective date for land restrictions applicable to its restricted waste? OR			X
15.1.A.3.b.	B. Has the facility been granted an exemption from prohibition pursuant to a petition for those land-restricted wastes and units covered by the petition? OR			X
15.1.A.3.c.	C. Are the wastes hazardous only because they exhibit a hazardous characteristic and are they disposed outside the Commonwealth into an injection well without exhibiting any prohibited characteristic of hazardous waste at the point of injection?			X
15.1.A.5.a.	30. Is the waste generated by small quantity generators of less than 220 pounds (100 kg) of hazardous waste, or 1 kg of acutely hazardous waste per month? If so, the wastes are not subject to any provision of Part XV.		X	
15.1.E.	31. Has the owner/operator submitted an application for case-by-case extension to the effective date of any applicable restriction?			X
6.4.E.7., 6.4.E.4.d., 15.1.G.1.d.	32. Is the SQG treating waste in Tanks or Containers in order to meet applicable treatment standards under VHWMR § 15.4?		X	
15.1.G.1.d.	33. If Yes, has the SQG developed a Waste Analysis Plan?			X
15.1.G.1.d. (2)	34. Has the Waste Analysis Plan been filed with the Director a minimum of 30 days prior to the treatment activity?			X

PART/ SECTION	REGULATION	YES	NO	N/A
15.1.F.	35. Has the owner/operator been granted a petition seeking an exemption from a prohibition for the disposal of hazardous waste in a particular unit or units?			X
15.1.C.1.	36. Are facility representatives diluting the restricted waste or residual from treatment of the restricted waste as a substitute for adequate treatment, to circumvent the effective date of prohibition, to otherwise avoid a prohibition, or to circumvent a land disposal prohibition?		X	
15.1.D.1.	37. Is the facility treating land-restricted wastes in a surface impoundment or series of surface impoundments? (Note: Evaporation of hazardous constituents in a surface impoundment as the principal means of treatment is not considered to be an acceptable form of treatment for land restricted wastes.)		X	
	38. If Yes, does the facility meet the following requirements:			
15.1.D.1.b. 15.1.G. 15.3.C. 15.4. 15.3.	A. Are the residues of the treatment analyzed as specified in VHWMR § 15.1.G. or § 15.3.C. to determine if they meet the applicable treatment standards or VHWMR § 15.4, or where no applicable treatment standard exists, the applicable prohibition levels specified in VHWMR § 15.3?			X
15.1.D.1.c. 9.10.B.1. 10.10.B.3.	B. Has the owner/operator installed two or more liners and a leachate collection system consisting of an upper and lower liner designed, constructed and operated to prevent the migration of any constituents through the liners?			X
15.1.D.1.c. 10.5.	C. Is the facility in compliance with the applicable groundwater monitoring requirements of VHWMR § 10.5?			X
15.1.D.1.d.	D. Has the owner/operator submitted a written certification to the Executive Director that the requirements of § 15.1.D.1.C. have been met which states: "I certify under penalty of law that the requirements of 15.1.D.1.c. have been met for all surface impoundments being used to treat restricted waste. I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment." and			X
15.1.D.1.d.	E. Has the owner/operator submitted a copy of the waste analysis plan for his restricted wastes accompanied by the above certification?			X
15.1.G.1.b.	39. For restricted wastes which the generator has determined can be land disposed without further treatment , has the generator accompanied each shipment of waste with a notification and certification to the land disposal facility that the waste meets the applicable treatment standards and the applicable prohibitions of VHWMR § 15.3.C.?			X

PART/ SECTION	REGULATION	YES	NO	N/A
	40. Did the notification include the following information:			
15.1.G.1.b. (1)(a)	A. EPA Hazardous Waste Number?			X
15.1.G.1.b. (1)(b)	B. The corresponding treatment standards and all applicable prohibitions?			X
15.1.G.1.b. (1)(c)	C. The manifest number associated with the shipment of waste? and			X
15.1.G.1.b. (1)(d)	D. Waste analysis date, where available?			X
15.1.G.1.b.2.	41. Was the certification signed by an authorized representative, and did it state the following: "I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in VHWMR § 15.4. and all applicable prohibitions set forth in VHWMR § 15.3.C. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment."			X
15.1.G.1.c.	42. Have restricted wastes which have received a case-by-case exemption, been granted an exemption through petition, or those wastes subject to a national variance, has the generator forwarded a notice with the waste to the land disposal facility stating that the waste is exempt from the land disposal restrictions?			X
15.1.G.1.g.	43. Does the generator retain on-site copies of all notices, certifications, demonstrations, waste analysis data, and other documentation for at least five years from the date the waste was last sent to on-site or off-site treatment, storage or disposal?	X		
15.5.	44. Is the generator storing land restricted waste? (For one year storage only)		X	
15.5.1.a.	45. If Yes , is the storage on-site solely for the purpose of the accumulation of such quantities of hazardous waste as necessary to facilitate proper recovery, treatment or disposal?			X

COMMENTS: